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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, et al.,
Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**DECLARATION OF ERIK CREW IN
SUPPORT OF PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

[Filed concurrently with Motion, supporting
Attorney Declarations of Ahilan T.
Arulanantham, Emilou H. MacLean, Jessica
Karp Bansal; and [Proposed] Order]

Assigned to: Hon. Trina L Thompson

Date: TBD
Time: 2:00 p.m.
Place: Courtroom 9

Complaint Filed: July 7, 2025

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DECLARATION OF ERIK CREW

I, Erik Crew, hereby declare:

1. I am an attorney at law licensed to practice law in the State of New York and am admitted *pro hac vice* as counsel of record for Plaintiffs in the instant action. I am a Staff Attorney with the Haitian Bridge Alliance (“HBA”) and I make this declaration in support of Plaintiff’s Motion for Class Certification. I have personal knowledge of the facts set forth herein, and if called upon to testify as a witness thereto, I could and would competently do so under oath.

2. In addition to the instant case, I am admitted *pro hac vice* as counsel of record for the plaintiffs in *National TPS Alliance v. Noem*, Case No. 3:25-cv-01766 (N.D. Cal. 2025) (“*NTPSA P*”).

3. I received my law degree from Northern Kentucky University’s Chase College of Law (Chase) in 2019. Prior to matriculating through the part-time evening division as Chase’s only 2015 Salmon P. Chase Merit Scholar and only awardee of the 2019 Salmon P. Chase Award, I served as a paralegal at the Ohio Justice & Policy Center (OJPC), where I spent four years as the only paralegal to class counsel on *Fussel v. Wilkinson*, a complex litigation concerning civil rights violations and access to adequate medical care for the class of 50,000 people in Ohio prisons. I was the main point-of-contact for class representatives and the class, as well as class counsel’s main point-of-contact with the Court-appointed Monitor and its team of experts. I supported the investigation, filing, and casework on over 20 individual civil rights actions in the district courts of Ohio. During part-time night school for law and since graduation from law school, I have trained and received fellowships from renowned institutions at the forefront of international human rights litigation and advocacy, movement-centered legal practice, and client-centered litigation in U.S. courts, such as the Institute for Justice & Democracy in Haiti (IJDH); the Bureau des Avocats Internationaux (BAI) in Port-au-Prince, Haiti; the Center for Constitutional Rights; Black Europe Summer School (BESS); and Global Rights Compliance and the Association of Defense Counsel at the United Nations Mechanism for the International Criminal Tribunal for the Former Yugoslavia (ADC-MICT) in Den Haag, Netherlands.

4. HBA is a Black-led, women-led, Haitian Kreyòl-speaking grassroots and community-based nonprofit organization that provides migrants and immigrants with humanitarian, legal, and

1 social services, with a particular focus on Black immigrants, the Haitian community, women and
 2 girls, LGBTQIA+ individuals, and survivors of torture and other human rights abuses, and also
 3 advocates for fair and humane immigration policies. HBA is headquartered in San Diego, California.

4 5. HBA was incorporated in California in early 2016 to address the needs of an influx of
 5 Haitian and other Black immigrants seeking humanitarian protections in the U.S. as conditions in
 6 their countries deteriorated. Informed by that experience, HBA's primary mission is to assist
 7 recently arrived Haitian and other Black immigrants in acclimating to the United States and ensure
 8 their success in navigating their new lives. This includes helping them pursue immigration status
 9 here in the U.S., providing humanitarian services, and administering a welcoming program to assist
 10 with transitional needs.

11 6. Starting in 2020, HBA has operated a legal department with a small staff of attorneys
 12 who provide direct representation to Haitian and other Black people in U.S. immigration matters in
 13 California and other jurisdictions, including people in ICE detention, those in removal proceedings
 14 before the Executive Office for Immigration Review (EOIR), and those filing applications for
 15 immigration benefits with USCIS. In addition, HBA's work focuses on local, state, national, and
 16 international advocacy for fair and humane immigration policies and pathways.

17 7. Since 2020, HBA has expanded its litigation work to include affirmative federal court
 18 litigation. Since October 2020, as either co-counsel or as an organizational plaintiff, HBA has filed
 19 at least 3 amicus briefs and 10 cases in the federal district courts. HBA's recent federal court
 20 litigation has included challenges to immigration related policies brought under the Administrative
 21 Procedure Act (APA), the Fifth Amendment, and *habeas corpus*, as well as Freedom of Information
 22 Act (FOIA) litigation. In addition to the instant litigation, HBA is co-counsel in the following
 23 current cases: *NTPSA I*, No. 25-cv-01766 (N.D. Cal. 2025), *appellate proceedings pending*, No. 25-
 24 2120 (9th Cir. 2025) (challenging termination of Temporary Protected Status for over one million
 25 immigrants from Haiti and Venezuela); *Haitian Bridge Alliance v. Biden*, No. CV 21-3317 (D.D.C.
 26 June 14, 2022) (class action by asylum seekers expelled from the U.S. against various federal
 27 government officials and departments); *Tex. Civ. Rts. Project, et al., v. U.S. Customs and Border*
 28 *Prot.*, No. 1:24-cv-00535 (W.D. Tex. 2024). HBA is an organizational plaintiff in the following

current cases: *Al Otro Lado, Inc. v. Trump*, No. 25-cv-01501 (S.D. Cal. 2025) (class action challenging the federal government's actions in blocking accessing to asylum at ports of entry along the U.S.-Mexico border); *Doe v. Noem*, No. 1:25-cv-10495-IT (D. Mass. 2025), *appellate proceedings pending*, No. 25-1715 (1st. Cir. 2025) (challenging the federal government's termination of several humanitarian parole processes, including Central American Minors Parole, Family Reunification Parole, Military Parole-in-Place, Uniting for Ukraine, Operation Allies Welcome, and CHNV humanitarian parole); *Center for Constitutional Rights v. U.S. Dep't of Defense*, No. 25-cv-06214 (S.D.N.Y. 2025).

8. I joined HBA in 2021 to spearhead its international human rights advocacy and have now appeared before the United Nations Committee on the Elimination of All Forms of Racial Discrimination, the United Nations Committee on the Elimination of Discrimination Against Women, the United Nations Human Rights Committee, the United Nations Permanent Forum on People of African Descent, and the Organization of American States' Inter-American Commission on Human Rights, as well as organized and worked with directly-impacted people to deliver their testimony before the same Committees.

9. Since spring of 2024, I have increasingly prioritized HBA's affirmative federal court litigation. I currently serve as co-counsel or as the main organizational plaintiff's point-of-contact on HBA's current cases.

10. Since the vacatur and termination of Temporary Protected Status (TPS) for Venezuela and the partial vacatur of TPS for Haiti, HBA has been working with impacted communities, partner-civil-society organizations, and co-counsel to identify and investigate potential claims in actions on behalf of people affected by TPS terminations and to pursue them in federal district court.

11. HBA and I, in collaboration with co-counsel, will fairly and adequately represent the interests of the classes. With significant experience in immigrants' rights issues and class actions, including APA and civil rights cases, HBA has more than sufficient resources to litigate this matter vigorously.

12. If appointed class counsel, I will ensure that my co-counsel and I zealously represent the interests of the classes to the best of our collective ability.

1 13. I am not aware of any conflict among potential class members in this case.

2 14. I am not aware of any conflicts between HBA and any members of the potential class
3 that would prevent HBA from providing zealous representation to the class.

4 I declare under penalty of perjury under the laws of the United States and the State of
5 California that the foregoing is true and correct to the best of my knowledge. Executed on August
6 15, 2025, in Brooklyn, New York.

7
8 
9 Erik Crew

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

NATIONAL DAY LABORER
ORGANIZING NETWORK

/s/ Jessica Karp Bansal

Jessica Karp Bansal
Lauren Michel Wilfong (*Pro Hac Vice*)